

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS

MAY 22 2019

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JAMES W. McCORMACK, CLERK

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
PINE BLUFF DIVISION

Recher
DEP. CLERK

Stansei Prowse ADC # 658340

Plaintiff

V.

Case NO. 5:19-CV-115-JM-JTK

Wendy Kelley, et al.

Defendants

Plaintiff's Proposed Amended Complaint

On February 9, 2018, I was diagnosed with Gender Dysphoria Disorder by a licensed psychiatrist named Dr. Giggelman, who is contracted with ADC. On March 1, 2018, I was seen by the Gender Dysphoria Committee (which was made of multiple people including Bob Parker, Rory Griffin and Wendy Kelley as the leading members) whom acknowledged and confirmed my diagnosis on 2/09/18, but denied me hormone therapy as a means of treatment as well as any other form stating "hormone therapy was not clinically indicated nor recommended". I was diagnosed with a psychiatric disorder by a licensed psychiatrist but was denied medical care to treat this disorder. Dr. Bob Parker is an appropriate defendant for this civil action

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due to the fact that Gender Dysphoria Disorder is a psychiatric disorder and the Defendant is Deputy Director of Mental Health and Correctional Programs and is a leading member of the Gender Dysphoria Committee. He is licensed to make diagnosis and prescribe treatments.

Rory Griffin is an appropriate defendant for this legal action due to the fact that she is the Deputy Director of Health and Correctional Programs. As such, it is her duty to provide health care services accessible to all inmates, which at a minimum, meet reasonable and necessary health care needs as AR 833 (Health Services) states. She is also a leading member of the Gender Dysphoria Committee and is licensed to treat both medical and mental disorders, or authorize the treatments of such. Director Wendy Kelley is an appropriate defendant for this civil action due to the fact that she holds the ultimate authority of every department within the ADC, as the Director of ADC. When I utilized the Prison Litigation Reform Act as a means of attempting to receive treatment for Gender Dysphoria, her response was the final one

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before I exhausted the grievance procedure. She as well denied me treatment for a psychiatric disorder and she is also the head of the Gender Dysphoria Committee. I am constantly in conflict with my assigned gender at birth and the one I express myself as. I suffer from manic depression that at times immobilizes me and leaves me with only enough energy to eat and bathe. I have an extensive history of suicide attempts and self mutilation after I became so disgusted with my physical self that I just wanted to destroy it. When I was finally given the diagnosis of Gender Dysphoria, I became the happiest I've been in a very long time only to descend back into the abyss when I was denied hormone therapy. I was given the key, but no car and now I'm pursuing the car on foot. I'm more suicidal today than I was a year ago and it's all because I have everything except the tools I need to help fix me with and make me perfect. That's depressing.

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Wherefore, the Plaintiff submits this
Proposed amended Complaint and respectfully
requests the Courts to please accept it

Respectfully Submitted,

Stanzel Prowse
Plaintiff

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